

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Kenn Zou aka Kang Zou, individually and derivatively  
On behalf of JLK Holdings, INT, LLC, and Chunlan Li

Plaintiffs,

CASE# 23-cv-2370-JMA-JMW

-against-

Xiao Han and Jun Tang a/k/a Judy Tang

Defendants.

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**NOTICE OF SUBPOENA**

To: Attorneys for the Defendants

**PLEASE TAKE NOTICE** that the undersigned attorneys for Plaintiffs, shall serve the annexed subpoenas on Bank of America and Chase Banks, as named in the annexed subpoenas, for productions of bank account statements and records of all transactions, deposits and withdrawals of JLK Holdings, INT, LLC, defendant Jun Tang and defendant Xiao Han from July 2015 to the present; with a production date and time: 01/30/2024, 12:00 noon at the undersigned attorney's office, pursuant to Federal Rule of Civil Procedure 45.

Dated: Flushing, New York

Dec. 22 2023

LAW OFFICE OF MING HAI, P.C.

By: s/ *Ming Hai*  
Ming Hai  
36-09 Main Street, 7B  
Flushing, NY 11354  
(718) 445-9111  
Attorneys for Plaintiffs

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

Kenn Zou aka Kang Zou, et al

*Plaintiff*

Xiao Han and Jun Tang aka Judy Tang, et al

*Defendant*

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Civil Action No. 23-cv-2370-JMA-JMW

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Chase Bank  
39-01 Main St, Flushing, NY 11354

(Name of person to whom this subpoena is directed)

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any and all bank accounts statements of Jun Tang (S.S# 080-86-7314), including records of all transactions, deposits and withdrawals from July 2015 to the present.

Place: Law Office of Ming Hai, PC  
36-09 Main Street, Suite 7B  
Flushing NY 11354

Date and Time:

01/30/2024 12:00 pm

**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 12/22/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Plaintiffs  
Ken Zou, JLK Holdings, INT LLC and Chunlan Li , who issues or requests this subpoena, are:  
Law Office of Ming Hai, PC , 36-09 Main Street, Suite 7B, Flushing NY 11354. Lawminghai@gmail.com, (718) 445 9111

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

Kenn Zou aka Kang Zou, et al

*Plaintiff*

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Civil Action No. 23-cv-2370-JMA-JMW

Xiao Han and Jun Tang aka Judy Tang, et al

*Defendant*

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**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To:

Close Bank  
39-01 Main St, Flushing, NY 11354

(Name of person to whom this subpoena is directed)

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any and all bank accounts statements of Xiao Han (S.S# 134-86-4292), including records of all transactions, deposits and withdrawals from July 2015 to the present.

Place: Law Office of Ming Hai, PC  
36-09 Main Street, Suite 7B  
Flushing NY 11354

Date and Time:

01/30/2024 12:00 pm

**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

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Date and Time:

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Attorney's signature

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AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT  
for the

Eastern District of New York

Kenn Zou aka Kang Zou, et al

*Plaintiff*

v.

Xiao Han and Jun Tang aka Judy Tang, et al

*Defendant*

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Civil Action No. 23-cv-2370-JMA-JMW

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Bank of America  
39-12 Main St., Queens NY 11354

(Name of person to whom this subpoena is directed)

*Production:* YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: Any and all bank accounts statements of Xiao Han (S.S# 134-86-4292), including records of all transactions, deposits and withdrawals from July 2015 to the present.

Place: Law Office of Ming Hai, PC  
36-09 Main Street, Suite 7B  
Flushing NY 11354

Date and Time:

01/30/2024 12:00 pm

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Date: 12/22/2023

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

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Ken Zou, JLK Holdings, INT LLC and Chunlan Li , who issues or requests this subpoena, are:  
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UNITED STATES DISTRICT COURT

for the

Eastern District of New York

Kenn Zou aka Kang Zou, et al

*Plaintiff*

v.  
Xiao Han and Jun Tang aka Judy Tang, et al

*Defendant*

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Civil Action No. 23-cv-2370-JMA-JMW

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To:

Bank of America  
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Flushing NY 11354

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Xiao Han and Jun Tang aka Judy Tang, et al

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Place: Law Office of Ming Hai, PC  
36-09 Main Street, Suite 7B  
Flushing NY 11354

Date and Time:

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